

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
	:	
- against -	:	
	:	
	:	19 CR 108 (MKB)
ANDRE WILBURN	:	
	:	
	:	
Defendant.	:	
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RESPONSE TO MR. WILBURN'S LETTER

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VIA ECF

Honorable Chief Judge Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Wilburn
Docket # 19 Cr 108

Dear Judge Brody,

Please be advised that I am responding to Mr. Wilburn's recent request filed on September 13 docket entry 164 that Zachary Taylor be relieved as counsel in this matter. I oppose this request. Mr. Taylor was brought into this matter to assist me on all aspects of the case. His advice and legal acumen have been extremely helpful thus far and I anticipate that he will be a wonderful partner in preparing for future litigation in this case.

I have worked closely with Mr. Taylor on a number of cases and he is not only a brilliant legal talent, he is also a compassionate person has produced first rate sentencing submissions. Mr. Taylor joins me in this application.

Respectfully submitted,

By: /s/Samuel Gregory/
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Cc: The Hon. Margo K. Brodie (by ECF)

Clerk of Court (MKB) (by ECF)

Eric Silverberg for the Government (by ECF)